REMARKS

Status of the Application

Claims 1-20 are pending in the application and have been examined.

Claim Rejections

Claims 1-20 - 35 U.S.C. § 103(a)

Claims 1-20 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over

U.S. Pat. Pub. No. 2002/0152267 to Lennon ("Lennon") in view of U.S. Pat. Pub. No.

2003/0069900 to Hind ("Hind"). Applicant traverses this rejection.

With regard to claim 1, Applicant respectfully submits that the combination of Lennon

and Hind does not disclose or suggest at least "an input unit which receives an index

configuration from a user for configuring indexes of multimedia content," as recited in the claim.

The Examiner concedes the Lennon fails to disclose or suggest at least these features, and relies

on Hind to allegedly disclose that an input unit receives an index configuration from a user.

Hind, however, fails to disclose or suggest these claimed features.

Hind discloses selection techniques which enable a user to indicate *criteria* which may be

used for organizing stored objects *for an adaptive index* (¶ [0037]). As disclosed by Hind, a

multilevel indexing scheme which is based on user behavior is used to organize stored electronic

objects. A user customizable relational model allows rendered objects to be organized according

to one or more criteria (¶ [0038]). Further, *criteria for use in the index are learned* by detecting

occurrences of user configurable actions (¶ [0025]). In the words, the system of Hind renders a

graphical representation of stored electronic objects which are organized based on criteria

learned by the system as a result of a user's actions. Thus, the system disclosed by Hind *learns*

criteria for storing objects in an adaptive index. Hind, however, is silent as to *receiving an*

index configuration from a user for configuring indexes of multimedia content, as required by

claim 1.

Accordingly, Applicant respectfully submits that claim 1 is patentable over the

combination of Lennon and Hind since the combined references do not disclose or suggest all of

the claimed features.

Independent claim 11 recites features similar to the features recited in claim 1.

Accordingly, Applicant respectfully submits that claim 11 is patentable over the combined

references for reasons similar to claim 1 is patentable.

Applicant respectfully submits that claims 2-10 and 12-20 are patentable at least by virtue

of their dependencies from one of claims 1 and 11.
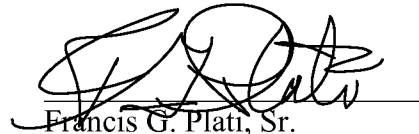
Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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